

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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MONTVALE SURGICAL CENTER a/s/o  
MARK REEVES,

Plaintiffs,

v.

HORIZON BLUE CROSS BLUE SHIELD OF  
NEW JERSEY, INC.; PSE&G; ABC CORP.  
(1-10)(Said names being fictitious and  
unknown entities)

Defendants.

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CIVIL ACTION NO.: 12-02478

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**NOTICE OF MOTION**

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TO: Andrew R. Bronsnick, Esquire  
Massood & Bronsnick LLP  
50 Packanack Lake Road East  
Wayne, NJ 07470-5834

**PLEASE TAKE NOTICE** that Defendant Horizon Blue Cross Blue Shield of New Jersey (“Horizon”), by its undersigned counsel, shall move for an Order dismissing Plaintiff’s Complaint before the United States District Court for the District of New Jersey, M.L. King Jr., Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey on June 18, 2012, at 9:00 a.m. or as soon thereafter as counsel may be heard.

In support of this Motion, Defendant Horizon Blue Cross Blue Shield of New Jersey shall rely on the accompanying memorandum of law.

CONNELL FOLEY LLP  
Liberty View  
457 Haddonfield Road, Suite 230  
Cherry Hill, New Jersey 08002  
(856) 317-7100

*Attorneys for Defendant  
Horizon Blue Cross Blue Shield of New  
Jersey*

BY:

  
Matthew A. Baker, Esquire

DATE: May 17, 2012